

EXHIBIT 1

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Attorneys for Plaintiffs

DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

PROJECT VERITAS,
PROJECT VERITAS ACTION FUND,

Case No.: 20-CV-01435-JR

Plaintiffs,

AFFIDAVIT OF ROBERT JOEL
HALDERMAN IN SUPPORT OF
PLAINTIFFS' RESPONSE TO DEFENDANTS'
MOTION TO DISMISS

v.

MICHAEL SCHMIDT, in his official
capacity as Multnomah County District
Attorney,
ELLEN ROSENBLUM, in her official
capacity as Oregon Attorney General,

Defendants.

- 1 - Affidavit of Robert Joel Halderman in Support of Plaintiffs' Response to Defendants'
Motion to Dismiss



I, Robert Joel Halderman, being duly sworn upon my oath do hereby state the following to be true and accurate:

1. I have served as the Executive Producer of Project Veritas and Project Veritas Action Fund (the "Project Veritas Parties") since 2014.
 2. I submit this affidavit in support of the Project Veritas Parties' response to the Defendants' motion to dismiss. I am familiar with the claims raised by the Project Veritas Parties. I am authorized to make this affidavit on behalf of the Project Veritas Parties and I make these statements based on my personal knowledge or upon review of the information kept in the course of normal business operations by the Project Veritas Parties. The facts set forth in this affidavit are true to my knowledge.
 3. The Project Veritas Parties are journalism organizations that almost exclusively rely on secret audio and audiovisual recording to report to the public about instances of corruption, fraud, waste, and abuse. They have investigated or reported to the public about numerous matters of public concern.
 4. The Project Veritas Parties frequently receive tips and information from third parties. This sometimes includes audio or audiovisual recordings of these third parties' conversations made with concealed and unconcealed devices.
 5. One such instance, in 2017 the Project Veritas Parties received, unsolicited, more than 200 hours of audio recordings of conversations made secretly at CNN Headquarters in Atlanta.
 6. On information and belief, these recordings were made in 2009.
 7. No Project Veritas or Project Veritas Action Fund employee or agent played any part in the creation of these recordings.
- 2 - Affidavit of Robert Joel Halderman in Support of Plaintiffs' Response to Defendants' Motion to Dismiss

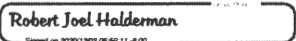
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8. The Project Veritas Parties did not know of the existence of these recordings until 2017.
9. Some excerpts of these recordings were published at the following web address on February 23, 2017: https://youtu.be/xf-0_dFnl-Y.
10. On information and belief, if these recordings had been made in Oregon, it would be illegal for the Project Veritas Parties to obtain, use or divulge them under Oregon Revised Statutes section 165.540(1)(d) and (e).
11. But for Oregon Revised Statutes section 165.540(1)(d) and (e), the Project Veritas Parties would obtain, use and divulge conversations initially obtained by means prohibited under the law.

Pursuant to 28 U.S.C. § 1746, I, Robert Joel Halderman, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 3, 2020.

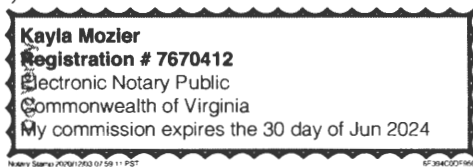
By: 
Robert Joel Halderman

Commonwealth of Virginia
County of Fairfax

The foregoing was subscribed and sworn before me this 3rd day of December, 2020 by Robert Joel Halderman.

My commission expires:
June 30, 2024


Notary Public



- 3 - Affidavit of Robert Joel Halderman in Support of Plaintiffs' Response to Defendants' Motion to Dismiss





Schmidt - Halderman Affidavit - final.pdf

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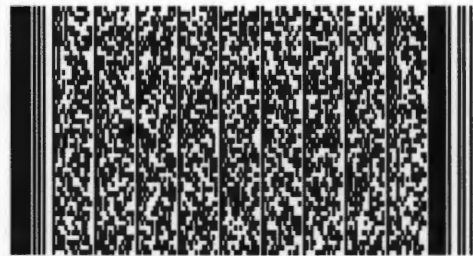
E-Signature Summary

Signer 1: Robert Joel Halderman (RJH)

December 03, 2020 06:59:11 -8:00 [62C926158688] [73.129.250.81]
 joe@projectveritas.com (ID Verified)

E-Signature Notary: Kayla Mozier (KM)

December 03, 2020 06:59:11 -8:00 [6F394C0DF959] [72.83.44.74]
 kayla@clarelocke.com
 I, Kayla Mozier, did witness the participants named above electronically sign this document.



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